REMARKS

Claims 1 - 39 remain active in this application.
Claims 11 - 29 have been withdrawn from consideration as
being non-elected, with traverse, in response to a
requirement for restriction. The specification has been
reviewed and editorial revisions made where seen to be
appropriate. Claims 1, 2, 6, 7, 30, 31, 35 and 36 have
been amended. Support for the amendments of the claims
is found throughout the application, particularly in
Figure 3A   and the description in paragraphs 0043 -
0048. No new matter has been introduced into the
application.

The Examiner has maintained the requirement for
restriction. However, the previously submitted traverse
of the requirement is respectfully maintained since the
Examiner has not properly demonstrated separate utility
of the identified inventions. It is again respectfully
submitted that all of the separate utilities asserted by
the Examiner are, in fact, simply different functions
needed in a single enterprise system of general
applicability and thus do not represent separate
utilities at all but only different aspects of a single,
comprehensive system. Therefore, since the utility of
the respective inventions identified by the Examiner are,
in fact, related by the overall enterprise system, the
identified inventions should not be considered
independent for purposes of restriction. In this regard,
the Examiner indicates that searches of six different
subclasses would be required for the six inventions, as
identified by the Examiner and yet the Examiner has not
indicated any search area that would be required for one
identified invention where no relevant art would be
expected for another identified invention where all of

the identified inventions are, in fact, related as
aspects of the same overall enterprise system.
Accordingly, it is again respectfully submitted that the
Examiner has not properly demonstrated either
distinctness of the identified inventions or the
existence of a serious burden in the absence of the
requirement and it is respectfully requested that the
requirement for restriction be withdrawn and an action
given on the merits of all claims in the application.

In separate grounds of rejection, the Examiner has
rejected claims 1 - 10 and 30 - 39 under 35 U.S.C. §112,
first paragraph, as failing to comply with the written
description requirement or the enablement requirement of
the Statute based on criticisms of the recitations of an
"autonomous agent module" and "root cause analyzer
module". The Examiner has also rejected claims 2 - 5, 7
- 10, 31 - 34 and 38 - 39 under 35 U.S.C. §112, second
paragraph, as being indefinite based on criticisms of the
recitation of an "autonomous agent module". All of these
grounds of rejection are respectfully traversed.

It is noted that the Examiner's discussion of these
rejections essentially asserts that the autonomous agent
module necessarily involves artificial intelligence, the
methodology of which is not disclosed, and that there is
no disclosure of how the root cause analyzer module could
determine that certain data is unwanted, determine that
exclusion should be set and remove the data. Such is not
at all the case in regard to either recited module.

While it is intended that the claims not exclude
artificial intelligence or adaptive arrangements that
allow the system to "learn" through experience with
different input stimuli and operator responses thereto,
the basic functions of both recited modules are quite
simple and largely arbitrary and, in large part, do not

even require an algorithm to achieve the functions disclosed and recited. Moreover, for the claimed system and method to be of general applicability the functions of the autonomous agent module and the root cause analyzer module must be fundamental and generalized although additional functionality not required by the basic principles of the invention but which can enhance its functionality can be added, at will. In this regard, it should be noted that inclusion of neural intelligence or expert systems as enhancements of the invention are discussed in paragraphs 0063 and 0064 of the original specification.

More specifically, the autonomous agent module function of setting business rules need be no more than storing data to control the response of the system to conform to business rules of the enterprise, such as implementing schedules and/or determining conveyance of particular information to particular individuals or organizations within the enterprise. Likewise, setting and responding to trigger events literally need be no more than storing alarm limits and when such alarm limits have been exceeded. Therefore, it is respectfully submitted that the autonomous agent module, at a fundamental level capable of supporting requirements of the system in accordance with its basic principles, could be easily implemented by those of ordinary skill in the art at the time the invention was made simply from an enumeration of the intended basic functions thereof, as is clearly provided in the original specification. Nevertheless, the claims have been amended to refer only to setting of business rules to avoid any inference that artificial intelligence would be necessarily implied in setting business rules or setting and responding to trigger criteria.

Similarly, the functions of the root cause analyzer module should be definable broadly for a system of general applicability and need be no more than a filter such as a virus filter or so-called "spam" filter; either of which determines unwanted data, excludes the source and removes the data. Such filters have been well-known since well prior to the time the invention was made and are capable of implementing virtually any (e.g. positive or negative based on any arbitrary data or metadata content) filter criteria. Moreover, the root cause analyzer module is disclosed (see, for example, Figure 3A) as supplementing the function of the workflow manager module and it would be clear to those skilled in the art from the original disclosure, that unwanted data would be data which would cause parsing/processing/routing ambiguity for the workflow manager module and that the filter parameter(s) should be determined accordingly. Therefore, it is respectfully submitted that the original disclosure clearly would provide enablement of the practice of the invention to a person skilled in the art at the time the invention was made and thus satisfies the written description requirement, as well.

Further, in regard to the ground of rejection under 35 U.S.C. §112, second paragraph, the Examiner rejects claims 2, 7, 31 and 39 as failing to adequately define what is meant by analyzing the data and includes other claims by reason of dependency. It is respectfully submitted that the recitations of claims 2, 7, 31 and 36 is a matter of permissible breadth since the particular analysis performed is not critical to the operation of the invention is accordance with its basic principles and, in any event, these claims, particularly as amended, clearly indicate that the analysis must at least support the compilation of trend information although additional

analysis is not excluded. More importantly, it is
respectfully pointed out that claims 3 - 5, 8 - 10, 32 -
35 and 37 - 39 all further define operations in response
to trend information compiled in accordance with the
analysis and thus are not properly includable in the
rejection solely by reason of dependency.

Accordingly in view of the foregoing, it is
respectfully submitted that all grounds of rejection
under 35 U.S.C. §112 are without substantive basis,
particularly as now amended, and, upon reconsideration,
should be withdrawn.

Claims 1 - 10 and 30 - 39 have been rejected under
35 U.S.C. §101 as being to non-statutory subject matter.
This ground of rejection is respectfully traversed.

The Examiner apparently takes the position that
claimed subject mater is necessarily non-statutory if it
can be implemented in software. It is respectfully
submitted that, under applicable precedent, the
Examiner's position is incorrect. Claims 1 - 10 are,
inter alia, clearly directed to a "system" and claims 30
- 39 are clearly directed to a "workstation" both
including a module for providing a notification pathway,
a report engine module and a user interface, and thus are
clearly coupled to a machine and the claimed subject
matter, considered as a whole cannot be answered by
mental steps, a law of nature or an abstract idea; thus
clearly complying with the current "machine or
transformation test. Moreover, it has long been well-
established that the criterion asserted by the Examiner
(that the possibility of carrying out the invention using
software) is inappropriate by, for example, the decision
in In re Prater and Wei, 162 USPQ 541 (CCPA, 1969),
footnote 29. Accordingly, it is respectfully submitted
that this ground of rejection is clearly in error and,

upon reconsideration should be withdrawn. Therefore such actions are respectfully requested.

Claims 1 - 10 and 30 - 39 have been rejected under 35 U.S.C. §103 as being unpatentable over Van Huben et al. in view of Williams et al. This ground of rejection is also respectfully traversed.

The invention is directed to an enterprise system and workstation thereof which provides important enhancements of a collaborative design process as it applies to all phases of the lifetime of a product from conception of a need through obsolescence and disposal through intelligent distribution and notification of the development, entry and storage for access of information as it is developed. The system of Van Huben et al has some characteristics which resemble some aspects of enterprise systems, in general, but is principally directed to management of a distributed pluralities of libraries (to avoid "bottlenecks" due to many users accessing the same server - see column 10, lines 35 - 37) falls far short of answering the claimed subject matter.

For example, in regard to the claimed workflow manager (or "third") module, the Examiner merely refers to Figure 10 and associated text of Van Huben et al. As made clear from the "associated text" in column 30 of Van Huben et al., Figure 10 is merely an exemplary hierarchical data tree structure as a preferred organization of one or more of the pluralities of distributed libraries and which is, as such, incapable of providing any of the recited function(s) of the workflow manager, as claimed.

These deficiencies of Van Huben et al. are not mitigated in any way by Williams et al. and the Examiner has not asserted that they are. Williams et al. is cited only for teaching of "data mining" which is admittedly

not taught or suggested in Van Huben et al. Therefore, it is respectfully submitted that no *prima facie* demonstration of obviousness of any claim as originally submitted has been or can be made based on Van Huben et al. and Williams et al. and this ground of rejection is clearly in error and untenable for that reason.

Nevertheless, an important feature of the invention is to parse collected data both by lexical analysis and semantic parsing to determine its basic relevance and content and to distribute the information to individuals or organizations of the enterprise in accordance with business rules. This feature of the invention facilitates interaction of users with the system and vice-versa and improves efficiency by presenting a limited number of the latest version of relevant documents to members of the enterprise which can be projected to have a need for or interest in them. These documents can then be modified and circulated recursively to persons having relevant expertise to facilitate and expedite reaching a consensus since the issues for decision are thus substantially focused on the current problem(s) to be addressed. Accordingly, recitation of these features of the invention have bee included in claims 1, 6, 30 and 36 by the above amendment and it is respectfully submitted that nothing of the sort is seen to be taught or suggested in the references relied upon by the Examiner.

Accordingly, it is respectfully submitted that the claimed subject matter, both as originally filed and as now amended is fully and patentably distinguished from the prior art of record. Therefore, it is respectfully submitted that reconsideration and withdrawal of the ground of rejection based on prior art is clearly in order and such actions are respectfully requested.

Since all rejections, objections and requirements contained in the outstanding official action have been fully answered and shown to be in error and/or inapplicable to the present claims, it is respectfully submitted that reconsideration is now in order under the provisions of 37 C.F.R. §1.111(b) and such reconsideration is respectfully requested. Upon reconsideration, it is also respectfully submitted that this application is in condition for allowance and such action is therefore respectfully requested.

If an extension of time is required for this response to be considered as being timely filed, a conditional petition is hereby made for such extension of time. Please charge any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041.

Respectfully submitted,

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